

EXHIBIT 19

NADINE MENTOR
BARTOLETTI vs. CITIGROUP

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1 N. MENTOR
2 and then I expanded my coverage to the Atlanta
3 region.
4 Q. And when you say you covered
5 accounts in these different areas, how did you
6 get the accounts?
7 A. Some of them we were trying to
8 solicit new business, some of them were
9 existing business that weren't being covered
10 by the firm, and I was asked to cover accounts
11 that were previously neglected by the firm.
12 Q. When you use the phrase cover
13 accounts, what does that entail?
14 A. I'm a banker, so I cover my
15 clients. I make sure that I provide them with
16 complete information about their bond
17 portfolios, about financing opportunities,
18 looking at derivative opportunities and just
19 provide them with full service.
20 Q. And what was your objective, what
21 was it that you were doing for your clients?
22 A. Ultimately, figuring out ways to
23 finance their projects at the lowest cost of
24 capital, and reducing their debt service by
25 refinancing some of their outstanding bonds to

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1 N. MENTOR
2 help them save money.
3 Q. So within Citigroup as you were
4 doing that for your client base, were you
5 assigned a particular region: did it have an
6 official title?
7 A. No.
8 Q. So were you part of the Southeast
9 region?
10 A. I was a part of the Southeast
11 group and within that I covered a lot of
12 different accounts.
13 Q. Were all the accounts that you
14 covered in the Southeast?
15 A. No. No.
16 Q. So what accounts did you cover
17 outside of the Southeast region?
18 A. In the Northeast, I covered the
19 State of Connecticut and the City of Detroit.
20 Q. Was there a Northeast region of
21 public finance?
22 A. Yes.
23 Q. And did they have bankers covering
24 accounts in Connecticut from the Northeast
25 region of public finance?

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1 N. MENTOR
2 A. Yes.
3 Q. And the same for Detroit?
4 A. Yes.
5 Q. So how did it come to be that you
6 worked on accounts in Connecticut and Detroit?
7 A. Based on my relationship,
8 especially in Connecticut, I had been covering
9 the account previously at UBS since 2002, and
10 I was asked to work on the Connecticut account
11 because I had a relationship.
12 Q. And when you say the Connecticut
13 account, is that the State of Connecticut?
14 A. Yes.
15 Q. And which bankers at Citigroup,
16 which senior bankers were covering the State
17 of Connecticut?
18 A. Myself and Kristen Johanson.
19 Q. And Kristen, what was her title?
20 A. She is a managing director.
21 Q. And do you know how long she had
22 been covering the State of Connecticut?
23 A. I'm not sure.
24 Q. She was covering it at the time
25 you joined Citigroup?

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1 N. MENTOR
2 A. Yes.
3 Q. And you were asked to assist her
4 based on your relationships?
5 A. I was asked to partner with her.
6 Q. Based on your relationships?
7 A. Yes.
8 Q. And then how about for Detroit,
9 who was the senior banker or senior bankers
10 that covered that?
11 A. Jim Haddon.
12 Q. Anyone else?
13 A. No.
14 Q. What was Mr. Haddon's title?
15 A. Managing director.
16 Q. Do you know how long he had been
17 covering Detroit at the time you joined
18 Citigroup?
19 A. I'm not sure.
20 Q. It was an existing client of Mr.
21 Haddon's at the time you joined, correct?
22 A. Yes.
23 Q. Were there any other junior
24 bankers assisting Mr. Haddon on that account?
25 A. There were a couple. I'm trying



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1 N. MENTOR
2 to remember their names now.
3 A. I think Brian was working on it.
4 Q. Brian who?
5 A. Cloonan.
6 Q. Cloonan?
7 A. And I don't remember the other --
8 some of the other bankers.
9 Q. And how about for Connecticut,
10 were there other bankers working with
11 Christine --
12 A. Kristen.
13 Q. Kristen.
14 -- on that account?
15 A. Ben Cooper. Yes, that's all I
16 remember. I know there are other analysts,
17 but I can't remember their names.
18 Q. Do you know what Ben Cooper's
19 title was?
20 A. I believe he was an associate.
21 Q. And how about Brian Cloonan, what
22 was his title?
23 A. I believe, I believe he was an
24 analyst.
25 Q. Within the Southeast region and

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1 N. MENTOR
2 the accounts that you covered there, for each
3 of the accounts, was there a senior banker
4 working on those accounts in addition to
5 yourself?
6 A. Not all. Not all.
7 Q. Which of the accounts were you the
8 most senior banker on?
9 A. Broward County.
10 Q. Broward?
11 A. Broward County. Miami-Dade
12 County.
13 Q. Any others?
14 A. Miami-Dade schools, Miami-Dade
15 Expressway Authority, and the Virgin Islands.
16 Q. So let me ask you about each of
17 those.
18 Broward County, first.
19 A. Yes.
20 Q. Was that a relationship that
21 Citigroup had at the time you joined?
22 A. Actually, in Broward County in
23 particular, Citi had not done a deal for
24 Broward County in 15 years. And we had been
25 trying to get into it and we actually, based

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1 N. MENTOR
2 on covering staff, as to covering
3 commissioners, we got an account. Actually, I
4 got a \$180 million deal appointed to us right
5 before we were -- I was terminated.
6 Q. And is that the first deal you got
7 for Broward County?
8 A. Yes.
9 Q. And how did that deal come about?
10 Did you do a pitch?
11 A. Yes. We were -- I was covering
12 it. You know, I had my junior bankers working
13 with me.
14 Norm kind of is overarching as the
15 managing director. Of the group he is
16 involved in all different accounts, but I was
17 doing the coverage and the day-to-day updates
18 on the accounts.
19 So we, you know, I got the team
20 together. We needed airport people, I pulled
21 in an airport expert. If we needed Work First
22 Housing, I pulled in Work First Housing. But
23 I covered the account. I helped to strategize
24 how we are going to present information. We
25 did a pitch and we were selected.

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1 N. MENTOR
2 Q. When was the pitch?
3 A. The summer of '08 for the new
4 teams, I think.
5 Q. Did Mr. Pellegrini participate in
6 that pitch?
7 A. Yes, he did.
8 Q. And he was a managing director?
9 A. Yes.
10 Q. At that time?
11 A. Yes.
12 Q. And do you recall who else was
13 part of that pitch?
14 A. Neil Atterman I believe was there.
15 He is our airport specialist. And there was
16 someone there from our underwriting desk, but
17 I don't remember which underwriter.
18 Q. What was Mr. Atterman's title:
19 was he a managing director?
20 A. He's a managing director.
21 Q. And how about the underwriter?
22 A. He was a managing director.
23 Q. Do you know whether Mr. Atterman
24 had done any work for Broward County prior to
25 this pitch that you did in the summer of 2008?



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1 N. MENTOR
2 A. When I joined Citi probably in
3 '06.
4 Q. And who assigned you to that
5 account?
6 A. Mr. Haddon, Jim Haddon requested
7 that I work on it. He asked Norm if I can
8 work with him on it.
9 Q. Was the Virgin Islands a client of
10 Mr. Haddon's?
11 A. Yes.
12 Q. So you supported him in covering
13 that client?
14 A. Yes.
15 Q. Do you know how long Mr. Haddon
16 had been doing work for Citigroup at the time
17 you joined?
18 A. I'm not sure.
19 Q. For the Virgin Islands.
20 A. I'm not sure.
21 Q. During your time at Citigroup, did
22 you bring in any new clients, in other words,
23 clients that Citigroup had never done work
24 for?
25 A. Not new clients; new transactions.

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1 N. MENTOR
2 We were transaction-based.
3 Q. So new transactions for existing
4 clients?
5 A. Yes.
6 Q. And when you say -- I use the
7 phrase did you bring in. When new
8 transactions were brought to Citigroup, were
9 you part of a team of bankers to bring those
10 in?
11 A. We were part of -- yes, we have
12 teams.
13 Q. And so on any of the new
14 transactions, were you the most senior banker?
15 A. At the time, yes.
16 Q. For which transactions were you
17 the most senior banker?
18 A. The Virgin Islands. Mr. Haddon
19 actually left the public finance division and
20 he went over to asset management. So I was
21 the most senior person covering the Virgin
22 Islands.
23 Q. When did Mr. Haddon go to asset
24 management?
25 A. I want to say '06, late '06, '07.

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1 N. MENTOR
2 Q. And after he went to asset
3 management from late '06 or early '07, how
4 many transactions did the public finance group
5 do for the Virgin Islands?
6 A. We did a transaction for WAPA, and
7 then we were a part of two transactions that
8 they did, I believe. And then we senior
9 managed, we were appointed as a senior manager
10 on the \$400 million transaction.
11 Q. And that was the one -- when was
12 the \$400 million transaction?
13 A. It was appointed in November.
14 Q. Of 2008?
15 A. Yes.
16 Q. Other than the Virgin Islands,
17 what other transactions were you the most
18 senior banker on?
19 A. For Broward County in terms of
20 that was my account, Norm made it very clear
21 that it was my account, that I was covering
22 the account and all responsibilities went
23 through me. So when we got appointed to the
24 Broward County account, that was my account.
25 Q. And so on those transactions for

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1 N. MENTOR
2 Broward County, was there any managing
3 director who worked on them?
4 A. Norm's name was on it but he
5 wasn't banking them. Like, he was, like, I'm
6 hands off; this is you.
7 Q. Other than Mr. Pellegrini, were
8 there any other managing directors?
9 A. No.
10 Q. Were there any other directors on
11 those accounts?
12 A. I included Mike as a support
13 person.
14 Q. Mike Baldwin?
15 A. Mike Baldwin.
16 Q. And you included him on the
17 Miami-Dade account?
18 A. No. For Miami-Dade I believe I
19 included Todd Holder as a support person.
20 Q. And Todd was a director?
21 A. And Todd was also a director like
22 me.
23 Q. Which accounts did you include
24 Mike on?
25 A. Broward.



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<p style="text-align: right;">Page 73</p> <p>1 N. MENTOR</p> <p>2 A. I think -- I believe after I was</p> <p>3 terminated, they pulled Mike Baldwin up to</p> <p>4 work on it.</p> <p>5 Q. Before you were terminated who was</p> <p>6 working on it?</p> <p>7 A. Myself, Ken, and I can't remember</p> <p>8 which junior banker.</p> <p>9 Q. Other than that one deal that was</p> <p>10 ongoing at the time you left, did you work on</p> <p>11 any other transactions for the City of North</p> <p>12 Miami?</p> <p>13 A. No.</p> <p>14 Q. Who were the other directors in</p> <p>15 the public finance group in 2008?</p> <p>16 MR. DATOO: The whole group or</p> <p>17 her --</p> <p>18 Q. Why don't we ask about Southeast</p> <p>19 region first.</p> <p>20 A. In the Southeast in 2008?</p> <p>21 Mike Baldwin, Brent Wilder and I'm</p> <p>22 not sure if -- I'm not sure if they are</p> <p>23 categorizing, Guy Logan and Bryce Holcombe in</p> <p>24 the Southeast because they reported to the</p> <p>25 Southwest, but they lived in the Southeast.</p>	<p style="text-align: right;">Page 75</p> <p>1 N. MENTOR</p> <p>2 Q. Do you know how many transactions</p> <p>3 he worked on?</p> <p>4 A. I do not.</p> <p>5 Q. Do you know whether he worked on</p> <p>6 more transactions than you did during your</p> <p>7 time at Citigroup?</p> <p>8 A. I don't know.</p> <p>9 Q. Brent Wilder, do you know how many</p> <p>10 transactions he worked on while you were at</p> <p>11 Citigroup?</p> <p>12 A. I don't know.</p> <p>13 Q. Do you know whether he worked on</p> <p>14 more transactions than you?</p> <p>15 A. I don't know.</p> <p>16 Q. So in terms of developing new</p> <p>17 business, new transactions, how does a</p> <p>18 director do that?</p> <p>19 A. Bring in revenues.</p> <p>20 Q. But how do you do that?</p> <p>21 A. Relationship, get to know your</p> <p>22 clients, get to know their bond portfolio,</p> <p>23 bring ideas to them, constantly market the</p> <p>24 firm. It's ongoing.</p> <p>25 Q. And you became a director in early</p>
<p style="text-align: right;">Page 74</p> <p>1 N. MENTOR</p> <p>2 Q. Mr. Logan, did he work in the same</p> <p>3 office as you?</p> <p>4 A. No.</p> <p>5 Q. And how about Mr. Holcombe?</p> <p>6 A. No.</p> <p>7 Q. So the only two directors in 2008</p> <p>8 other than yourself in the Southeast region</p> <p>9 were Mr. Baldwin and Mr. Wilder?</p> <p>10 MR. DATOO: Objection.</p> <p>11 A. As far as I can recall.</p> <p>12 Q. So for Mr. Baldwin, do you know</p> <p>13 whether he developed any new clients while you</p> <p>14 were working at Citigroup?</p> <p>15 A. I don't know.</p> <p>16 Q. How about Mr. Wilder, do you know</p> <p>17 whether he developed any new clients during</p> <p>18 the time you were at Citigroup?</p> <p>19 A. I don't remember.</p> <p>20 Q. In terms of the transactions that</p> <p>21 Mr. Baldwin did, do you know what transactions</p> <p>22 he worked on while you were at Citi?</p> <p>23 A. I don't remember every</p> <p>24 transaction. He was mostly a school district</p> <p>25 banker.</p>	<p style="text-align: right;">Page 76</p> <p>1 N. MENTOR</p> <p>2 2008, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And Mr. Baldwin had been a</p> <p>5 director while he was at UBS, right?</p> <p>6 A. Yes.</p> <p>7 Q. And how about Mr. Wilder, do you</p> <p>8 know how long he had been a director?</p> <p>9 A. I'm not sure.</p> <p>10 Q. You don't know when he was made</p> <p>11 director?</p> <p>12 MR. DATOO: Objection.</p> <p>13 A. I don't know.</p> <p>14 Q. Do you know whether -- was Mr.</p> <p>15 Wilder working at Citigroup when you joined?</p> <p>16 A. No.</p> <p>17 Q. He was hired after you joined?</p> <p>18 A. Yes.</p> <p>19 Q. Do you know whether he was hired</p> <p>20 as a director?</p> <p>21 A. I believe so.</p> <p>22 Q. Do you know what his experience</p> <p>23 was before joining Citi?</p> <p>24 A. I know he was a financial advisor.</p> <p>25 Q. For who?</p>

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1 N. MENTOR
2 November of 2008, was anybody else let go from
3 the group?
4 A. Yes.
5 Q. Who?
6 A. Brent Wilder.
7 Q. And at the time he was let go,
8 what was his title?
9 A. He was a director.
10 Q. When David Gray was let go, do you
11 know why he was selected for termination?
12 A. I don't know.
13 Q. Did you talk to anybody about why
14 he was selected?
15 A. No one really wanted to share. It
16 was very vague.
17 Q. Do you know why he was selected to
18 be let go rather than you?
19 A. I don't know.
20 Q. Do you know who made the decision
21 to let Mr. Gray go?
22 A. I don't know.
23 Q. For any of the reductions that
24 occurred within the Southeast group, do you
25 know who made the decisions as to who would be

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1 N. MENTOR
2 let go?
3 A. I don't. I don't know who made
4 the final decision.
5 Q. And for any of those reductions
6 that occurred within the Southeast group, do
7 you know the reasons for the decisions as to
8 who would be let go?
9 A. I don't know.
10 Q. When you were let go, who told you
11 you were being let go?
12 A. Norman Pellegrini.
13 Q. And did he tell you why?
14 A. He said it didn't make any sense.
15 He didn't, he said I don't understand, it
16 doesn't make any sense, you know, you should
17 not be fired right now, but.
18 Q. What else did he say?
19 A. He said, but -- and he apologized.
20 He said I'm sorry.
21 Q. Did he tell you why people from
22 the group needed to be let go?
23 A. He just said that people from the
24 group needed to be let go.
25 Q. Did he say it was for cost-cutting

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1 N. MENTOR
2 reasons?
3 A. He didn't say.
4 Q. Did he say it was because of the
5 financial pressures Citigroup was facing?
6 A. He said it's ridiculous and it
7 doesn't make sense.
8 Q. Did he talk about the environment,
9 the economic environment in 2008?
10 A. At the time he let me go, I don't
11 recall.
12 Q. When he told you you were being
13 let go, where were you?
14 A. In New York.
15 Q. And this was a telephone
16 conversation?
17 A. Yes.
18 Q. And where was Mr. Pellegrini?
19 A. In Florida.
20 Q. When Mr. Gray was let go, did you
21 think the decision-makers considered gender?
22 MR. DATOO: Objection.
23 A. I don't know what the
24 decision-makers were thinking.
25 Q. Did you talk to Kristen Johnson at

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1 N. MENTOR
2 all about the termination decisions being
3 made?
4 A. Kristen Johanson.
5 Q. Johanson.
6 A. Yes.
7 Q. And what did you and she talk
8 about in that regard?
9 A. When?
10 Q. What.
11 A. When are you talking about?
12 Q. Well, when did you discuss with
13 her the reductions that were being made?
14 A. She called me after I was
15 terminated.
16 Q. Before I get to your termination,
17 did you have any discussions with her about
18 other people that were being terminated within
19 the group?
20 A. She -- I don't remember.
21 Q. Do you know how many investment
22 banking jobs were cut from Citigroup in 2008?
23 A. I do not.
24 Q. Do you know how many investment
25 banking jobs were cut from public finance in

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1 N. MENTOR
2 2008?
3 A. I don't.
4 Q. Do you know how many males were
5 let go in the reductions in force?
6 A. I do not.
7 Q. And the same for females: Do you
8 know how many were let go?
9 A. I don't.
10 Q. Do you believe you were selected
11 for termination because of your gender?
12 A. Yes.
13 Q. Why do you believe that?
14 A. Because I was the only female
15 officer in the Southeast group. I was let go
16 and when lesser qualified males were retained.
17 My performance reviews were always excellent.
18 I was bringing in revenues and transactions
19 where some others were not. And, actually,
20 after I was terminated, other males took over
21 my accounts. And if it was for a cost-saving
22 purpose, I was cheaper than the directors
23 because I was still getting paid as a VP but
24 yet still bringing in money as a director.
25 Q. So at the time you were let go,

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1 N. MENTOR
2 there were three directors in the group. Is
3 that right?
4 MR. DATOO: Objection.
5 A. From what I recall, there were two
6 or three. I don't remember.
7 Q. Well, let's see if we can walk
8 through them. There was yourself, right?
9 A. Yes.
10 Q. Brent Wilder?
11 A. Yes.
12 Q. And Mike Baldwin?
13 A. Yes. And I don't remember if Rick
14 Patterson was a director or managing director
15 at the time.
16 Q. And Mr. Wilder was also let go at
17 the time you were, correct?
18 A. Mr. Wilder was no longer in the
19 Southeast group. In 2008.
20 Q. In November 2008?
21 A. No, he went to the Southwest.
22 Q. So at the time of your termination
23 in November of 2008, was it only you and Mr.
24 Baldwin who were the directors in the
25 Southeast group?

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1 N. MENTOR
2 A. I'm sorry, Mr. Wilder was a
3 director.
4 Mr. Holder went to the Southwest
5 in 2007.
6 Todd Holder was in the Southwest
7 group. Brent Wilder was in my group.
8 Q. Okay, so let's see if we can just
9 get it clean now.
10 A. Yes.
11 Q. At November of 2008 how many
12 directors were there in the Southeast group?
13 A. Myself, Brent Wilder, Mike
14 Baldwin, and I'm not sure when Rick Patterson
15 actually became a managing director.
16 Q. Was he a managing director before
17 you left?
18 A. I don't remember. I was trying to
19 remember that.
20 Q. And so when you said lesser
21 qualified males were retained, were you
22 talking about other directors in the group?
23 A. Directors and vice presidents
24 since I was still being paid as a vice
25 president.

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1 N. MENTOR
2 Q. So who are you referring to as
3 lesser qualified males who were retained?
4 A. Mike Baldwin, and, you know if
5 they are looking at revenues and that's the
6 only way companies stay in business is revenue
7 base, I was bringing in more revenues in 2008
8 and I had more revenues coming down the
9 pipeline than Mike Baldwin, I believe, at the
10 time.
11 Rick Patterson, although he may
12 have been a managing director, he had not
13 really been producing in 2008.
14 Q. Anybody else?
15 A. And I'm not sure if we want to --
16 if, for the sake of what they are looking at,
17 they are including Georgia or not, but even
18 Guy Logan and Bryce Holcombe.
19 Q. They were part of the -- what
20 group?
21 A. I don't remember because it was
22 internal politics as to if they are under
23 Southwest or Southeast, and I tried to stay
24 away from that.
25 Q. But they were formally assigned to

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1 N. MENTOR
2 the Southwest group though, correct?
3 A. Bryce was actually doing a lot in
4 the Southeast, he was still doing
5 Q. Understood. But in terms of what
6 group they were assigned to.
7 A. I'm not sure.
8 Q. So you said you had more revenues
9 than Mike Baldwin in 2008?
10 A. I believe.
11 Q. And why do you believe that?
12 What's that belief based on?
13 A. Transactions that I've done.
14 Q. So what do you believe your
15 revenues were in 2008?
16 A. I don't know. I don't recall the
17 exact revenues, but I know just the
18 transactions that had been done and what I had
19 been appointed to.
20 Q. And what were Mike Baldwin's
21 revenues in 2008?
22 A. I don't know that off the top of
23 my head.
24 Q. So what's the basis for you saying
25 you had more revenues than he did?

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1 N. MENTOR
2 A. In terms of transactions. So, I
3 mean -- transactions.
4 Q. So when you said you had more
5 revenues, am I correct that you are saying: I
6 had more transactions than he did?
7 A. Yes.
8 Q. But you don't know how much
9 revenue he brought in in 2008?
10 A. That's correct.
11 Q. So are you saying that you had
12 more transactions than Mr. Baldwin?
13 A. And I had more transactions coming
14 down the pipeline.
15 Q. And how many transactions did you
16 have coming down the pipeline?
17 A. Two major ones in particular, the
18 Broward County and the US Virgin Islands
19 transaction.
20 Q. And how many transactions did Mr.
21 Baldwin have coming down the pipeline when you
22 were let go?
23 A. None that I knew of that he had
24 been appointed to.
25 Q. And were you aware of every

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1 N. MENTOR
2 transaction that he was working on?
3 A. I'm not sure.
4 Q. And are you aware of every
5 transaction that was coming down the pipeline
6 for the other bankers in the group?
7 A. I'm not sure.
8 Q. You said that Rick Patterson was
9 not producing in 2008. What did you mean by
10 that?
11 A. He had previously been in the
12 derivatives group, and derivatives in 2008,
13 the market had dried up. So he was not -- he
14 didn't have any transactions.
15 Q. So when did he become part of the
16 Southeast group?
17 A. I believe he became a banker again
18 in '07. '07.
19 Q. And do you know what his revenues
20 were in 2007?
21 A. I do not.
22 Q. Do you know what they were in
23 2008?
24 A. I don't.
25 Q. Then you also mentioned Guy and

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1 N. MENTOR
2 Bryce, right?
3 A. Yes.
4 Q. But you are not sure whether they
5 were considered part of your group or not?
6 A. Yes.
7 Q. Do you know what their revenues
8 were in 2008?
9 A. I do not.
10 Q. And do you know what was in their
11 pipeline at the time you were let go in 2008?
12 A. I don't.
13 Q. Do you know whether revenues were
14 considered by the decision-makers at the time
15 they made their decisions as to who would be
16 let go?
17 A. I don't know that.
18 Q. Ms. Johanson was a managing
19 director, you said?
20 A. Yes.
21 Q. And when you talked to her about
22 the reductions in force, did you have
23 discussions -- and I may have asked this, but
24 I apologize -- did you have discussions with
25 her about the earlier reductions that occurred



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1 N. MENTOR
2 gotten negative feedback about the article?
3 A. No. She didn't, no.
4 Q. Anybody else, any of the others?
5 A. No. I don't believe I spoke to
6 them about the article afterwards.
7 Q. In your interviews with
8 prospective employers, whether telephonic
9 discussions or otherwise, what did you tell
10 them about the reason you had left Citi?
11 A. I told them I didn't want to leave
12 Citi, I didn't leave Citi, I was terminated
13 from Citi.
14 Q. And did you tell them it was part
15 of a broad reduction in force?
16 A. I told them that that's what Citi
17 told me, was part of a reduction in force.
18 Q. Did anyone question that?
19 A. Oh, yeah, they are like, are you
20 serious, this doesn't even make any sense, you
21 have been producing, you are director, you --
22 after we went through our accounts, no one
23 really quite understood why I was terminated.
24 Q. And you are referring to
25 prospective employers?

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1 N. MENTOR
2 A. Yes.
3 Q. Did you tell them how many people
4 were let go from Citigroup in 2008?
5 A. I didn't know that number.
6 Q. You knew that by early 2008
7 Citigroup had let 40,000 people go, correct?
8 MR. DATOO: Objection.
9 A. I've never heard that number
10 before.
11 Q. And you don't recall telling
12 anyone that?
13 A. I don't recall. I may have, but I
14 don't recall.
15 Q. And as I'm flipping through my
16 documents here, you now seem to think you may
17 have?
18 A. I don't recall.
19 MR. DATOO: Objection.
20 Don't answer that.
21 Q. Do you recall sending an e-mail in
22 which you referred to the number of
23 terminations at Citigroup?
24 A. I don't.
25 Q. Let me see if I can refresh your

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1 N. MENTOR
2 recollection. Let me show you an e-mail from
3 you to a group of people on March 18th of
4 2008, the subject is "God's word on
5 discouragement." We will mark this as Mentor
6 Exhibit 19.
7 (Mentor Exhibit 19, e-mail
8 from Nadine Mentor to a group of
9 people on March 18th of 2008 marked
10 for identification, as of this
11 date.)
12 Q. Do you see your e-mail at the top
13 of this exhibit?
14 A. I'm reading it. Yes.
15 Q. Does that refresh your
16 recollection that you told people that
17 Citigroup had laid off more than 40,000 people
18 by March of 2008?
19 A. Yes. I did not remember this from
20 over four years ago.
21 Q. And so you recall that Citigroup
22 was going through massive reductions in force
23 in 2008?
24 A. It would appear so.
25 Q. And do you have any reason to

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1 N. MENTOR
2 believe that your termination was not part of
3 those massive reductions?
4 MR. DATOO: Objection.
5 A. Yes. I have reason to believe as
6 I stated earlier, in terms of my being
7 terminated based on my gender.
8 Q. I know we talked about that and
9 the reasons why you believe that to be so.
10 But the termination itself was part of a
11 reduction in force.
12 A. I don't.
13 MR. DATOO: Objection.
14 Q. Do you understand that?
15 A. I don't know that because I don't
16 know why I was terminated. I don't know the
17 reason why I was terminated. It was not
18 relayed to me.
19 Q. I understand that testimony. But
20 do you know how many people were let go in
21 November of 2008 from Citigroup?
22 A. I don't recall that number. I
23 don't know if I knew that number in November
24 2008.
25 Q. But you do know that it was people



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1 N. MENTOR

2 Q. And what did he say on that? Was

3 this a phone conversation?

4 A. No, we met.

5 Q. Where did you meet?

6 A. At a place in Orlando, one of the

7 restaurants.

8 Q. And it was just you and he?

9 A. Yes.

10 Q. And what did he tell you about

11 what he was earning?

12 A. He said he was earning above the

13 450 to 550 range.

14 Q. I'm sorry, did I interrupt you?

15 A. No.

16 Q. Did he tell you what he earned in

17 2008?

18 A. No.

19 Q. Did he tell you what he earned in

20 2009?

21 A. I can't remember when I met with

22 him, was that in -- that was in 2010.

23 No, I don't know what he earned in

24 2009.

25 Q. And how about Mike Baldwin, do you

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1 N. MENTOR

2 know what he has earned at Citi since you

3 left?

4 A. I know he was earning more than I

5 earned when I was at Citi.

6 Q. While you were employed at Citi?

7 A. That is correct.

8 Q. And since you left, do you know

9 what he's earned?

10 A. No.

11 Q. How about Rob Szostak, do you know

12 what he's earned since you left?

13 A. No.

14 Q. So how did you use -- when I asked

15 you who you looked at to determine what you

16 would have been earning had you not been

17 terminated, you listed Mark Weinberg, Mike

18 Baldwin and Rob Szostak?

19 A. Because like I just said, Mark

20 Weinberg's range that he was making is above

21 550. I'm making 450 and he was junior to me.

22 So that was two years ago.

23 Like I said, Mike Baldwin was

24 making more than me before I left Citi, much

25 more than me. And so I was in between Mark

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1 N. MENTOR

2 Weinberg and Mike Baldwin, and Mark made a

3 comment that Mike still makes more than him.

4 So that would put me below both of them.

5 Q. So in making your determination as

6 to what you would be earning had you remained

7 at Citi, what did you conclude that number

8 would have been?

9 A. Above Mark -- above Mark

10 Weinberg's number which is between -- it's,

11 his number is more than 550.

12 Q. So what did you use in trying to

13 determine your lost pay, what number did you

14 use? Did you use 550, did you use 600, did

15 you use a million?

16 A. I don't remember exactly what

17 number I used. I don't have that calculation

18 with me right now.

19 Q. When did Mark become a director?

20 A. I'm not sure.

21 Q. When you left Citigroup, what was

22 his position?

23 A. A vice president.

24 Q. And then when you were determining

25 how much pay you think you had lost by virtue

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1 N. MENTOR

2 of your termination from Citi, what sort of

3 offsets did you use?

4 A. I don't understand.

5 Q. Well, you earned money at Ramirez,

6 correct?

7 A. Yes.

8 Q. So did you deduct that amount?

9 A. Yes.

10 Q. And did you deduct any other

11 amounts from that calculation?

12 A. Not that I recall. I don't

13 believe so.

14 Q. Have you earned any other income

15 since leaving Citigroup other than from Samuel

16 Ramirez?

17 A. Wage income? No. No.

18 Q. And what about any other type of

19 income, have you earned any other type of

20 income?

21 A. Rental income. That's been offset

22 by rental expenses.

23 Q. And do you recall that you

24 produced your tax returns as part of this

25 litigation?

